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Attorneys for Plaintiff

Giovanni Sedita

Plaintiffs

Vs.

Desert Springs Hospital Medical
Center

Defendants

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Civil Action No.:

CIVIL ACTION

COMPLAINT

Plaintiff, Giovanni Sedita, residing at 130 Valley View Dr., Rockaway, State of New Jersey, by way of Complaint say:

STATEMENT OF FACTS

1. Desert Springs Hospital Medical Center is a medical facility located at 2075 E. Flamingo Rd in the City of Las Vegas, Nevada.
2. Plaintiff, Giovanni Sedita, was a patient and under the care of Desert Springs Hospital Medical Center on March 12, 2014, after an accident he was involved in.
3. The care provided by Desert Springs Hospital Medical Center was deficient resulting in severe damages being suffered by the Plaintiff. The medical providers failed to inform the Plaintiff that smoking a cigarette could result in infection of the affected area.

4. John Does (1-10) and Jane Does (1-10) are the nurses and physicians employed by or associated with Desert Springs Hospital Medical Center responsible for the treatment of the Plaintiff but their names are unknown at the current time.

COUNT ONE

5. Plaintiff repeats all of the allegations contained in the Statement of Facts of this Complaint and incorporates same as if set forth at length herein.
6. The treating physicians and nurses of Desert Springs Hospital Medical Center were responsible for the care and wellbeing of Giovanni Sedita.
7. The treating physicians and nurses at Desert Springs Hospital Medical Center failed to properly treat and ensure the safety of Giovanni Sedita by failing to properly treat and diagnose him.
8. Defendants' failure to properly diagnosis and treat Giovanni Sedita was negligent, below the standard of care and amounts to malpractice.

WHEREFORE, Plaintiffs, demand:

- A. Judgment against the defendant, Desert Springs Medical Center Hospital.
- B. Damages, actual, compensatory and punitive.
- C. Interests and costs of suit.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues raised in this Complaint.

DESIGNATION OF TRIAL COUNSEL

Pursuant to **R. 4:25-4**, F. R. “Chip” Dunne, III, Esq., is hereby designated as trial counsel on behalf of the plaintiff.

CERTIFICATION OF NO OTHER ACTIONS

I certify that the subject of this litigation is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit at this time. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

DUNNE & ASSOCIATES, LLC


F.R. “CHIP” DUNNE, III, ESQ.